

### **REMARKS**

Applicants respectfully request Examiner acknowledge receipt of foreign priority document, Japanese Application No. JP2002-213004, that has been submitted pursuant to 35 U.S.C. § 119.

Without conceding the propriety of the Examiner's position, and solely to expedite prosecution, claims 2 – 5, and 11 - 30 have been cancelled without prejudice or disclaimer.

Applicants respectfully request reconsideration of Examiner's rejection of claims 6 and 9 under 35 U.S.C. §112. Applicants submit that Examiner's objections to these claims have been overcome by the instant amendment. Accordingly, Applicants request that the Examiner withdraw these rejections

Applicants respectfully request reconsideration of Examiner's rejection of claims 1 and 6 - 10 under 35 U.S.C. §102(b) and/or 35 U.S.C. §103(a). Applicants respectfully submit that the prior art references of record, whether considered alone or in combination fail to either teach or suggest Applicants presently claimed invention. More specifically, Applicants note that none of the cited prior art references provide any teaching or suggestion whatsoever regarding the desirability of locating the substrate holder within the critical range of locations within the chamber as now claimed.

The first full paragraph of page 20 of Applicant's instant disclosure teaches the criticality of depositing the substrate within a range of -60° to +80° from a horizontal axis bisecting said chamber. By restricting the position of the substrate to within this range, the

prior art problems of deformation of the substrate (for angles  $> + 80^\circ$ ) and adhesion of particles (for angles  $< -60^\circ$ ) are avoided. As a result, defects such as short circuits and dark spots are reduced, and a more uniform organic film is formed. At no point do any of Examiner's cited references teach or suggest such an invention and the benefits thus accrued. Accordingly, Applicants respectfully request Examiner withdraw his §102 and §103 rejections, and allow all claims.

Examiner's remaining references cited but not relied upon, considered either alone or in combination, also fail to teach applicant's currently claimed invention. In light of the foregoing, Applicants respectfully submit that all claims now stand in condition for allowance.

Respectfully submitted,

Date:

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